

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

Y-TRAP, INC.,

Plaintiff,

v.

BIOCON, LTD and BICARA  
THERAPEUTICS, INC.,

Defendants.

Case No. 1:24-cv-12678-GAO

**ORAL ARGUMENT REQUESTED**

**PENDING MOTION FOR LEAVE TO  
FILE EXCESS PAGES (ECF NO. 41)  
FILED ON 1/9/2025**

**DEFENDANT BICARA THERAPEUTICS, INC.'S  
MOTION TO DISMISS THE COMPLAINT**

Defendant Bicara Therapeutics, Inc. (“Bicara”), by and through its counsel, respectfully moves pursuant to Fed. R. Civ. P. 12(b)(6) to dismiss Plaintiff Y-Trap, Inc.’s (“Y-Trap”) claims against Bicara based on Y-Trap’s failure to state a claim upon which relief can be granted. The grounds for this motion are fully set forth in Bicara’s Memorandum of Law in Support of its Motion to Dismiss the Complaint and the Declaration of Daryl L. Wiesen in Support of Bicara’s Motion to Dismiss the Complaint, filed concurrently herewith.

WHEREFORE, Bicara respectfully request that this Court issue an order dismissing the Complaint against Bicara in its entirety and with prejudice, and grant such other and further relief that the Court deems just and proper.

**LOCAL RULE 7.1(a)(2) CERTIFICATION**

I hereby certify that counsel for Bicara and counsel for Y-Trap conferred in good faith about this motion and did not resolve or narrow the issues raised in this motion.

*/s/ Daryl L. Wiesen*  
Daryl L. Wiesen

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(d), Bicara requests oral argument on their Motion to Dismiss the Complaint.

Dated: January 10, 2025

Respectfully submitted,

BICARA THERAPEUTICS, INC.

By its attorneys,

*/s/ Daryl Wiesen*  
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*Counsel for Defendant Bicara Therapeutics, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was filed using the Court's CM/ECF system and will be served upon all counsel of record as indicated in the Notice of Electronic Filing (NEF) on January 10, 2025.

*/s/ Daryl L. Wiesen*  
Daryl L. Wiesen